

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JEFFERY M. HEALEY,
PLAINTIFF

v

DOCKET # 01-11089NG

ROBERT MURPHY, et al.,
DEFENDANTS

and

JOEL PENTLARGE, and
EDWARD GIVEN,
PLAINTIFFS

v

DOCKET # 04-30177NG

ROBERT MURPHY, et al.,
DEFENDANTS

MOTION FOR STORAGE SPACE
and DAILY ACCESS TO STORAGE

Now comes the pro se Plaintiff,
Edward Given in the above-entitled
matter who respectfully moves this
Honorable Court to issue an order
to the Defendant Robert Murphy to
supply the Plaintiff with a second
metal footlocker for the storage of
documents related to this action,
and for this storage locker to be

placed and maintained in what is known as the "Resource Room" on the pro se Plaintiff's housing unit (B-2) where the pro se Plaintiff will have daily access to the legal material and to further order that the Defendants replace the not working "unit" typewriter with either another memory typewriter or word processor. In support thereof, the pro se Plaintiff states:

1. The pro se Plaintiff Edward Given is incarcerated at the Nemasket Correctional Center and is in the Direct Custody of the Defendant Robert Murphy

2. That due to the complexity of this case and the ever growing number of documents, (now docketed at 166 plus) the ~~pro~~ pro se Plaintiff requires additional space in order to comply with the Defendant's policy of one (1)

cubic foot of legal storage within his cell.

3. That due to the ever growing number of days that the Property Department is closed, placing any documents in storage there greatly restricts the pro se Plaintiff's ability to access the material.

4. That providing a steel footlocker in the "Resource Room" on the pro se Plaintiff's housing unit will allow him access during the daytime hours

5. The pro se Plaintiff will supply a combination padlock to secure the material above and beyond the normal securing of the "Resource Room" by the Department of Correction Officer

6. That ordering the Defendants,

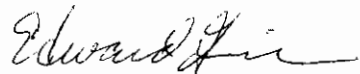
to replace the nonoperating "unit" memory typewriter and supplies will compensate for the daily closing of the law library which greatly restricts the pro se Plaintiff's access to a typewriter, which would decrease the number of pages needed to write documents such as this.

7. That replacing the "unit's" memory typewriter would ensure that the pro se Plaintiff's filings will conform to this Honorable Court's standards.

Wherefore, for the above stated reasons, the pro se Plaintiff prays this Honorable Court will grant his motion and issue an order to the Defendants to provide a steel footlocker in the "Resource" room, and to replace the nonoperational memory typewriter so that the

residents of "B-2" housing unit
will have daily access to a working
memory typewriter.

Respectfully Submitted,



EDWARD GIVEN, pro se
30 ADMINISTRATION RD
BRIDGEWATER MA 02324

5-5-08

CERTIFICATE OF SERVICE

I, Edward Given do hereby
certified that I served a ~~copy~~ hand
copy of this motion for Storage
Space on Defense Counsel Mary
Murray via intrafacility mail on
this date: 5-5-08



EDWARD GIVEN, pro se